INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Governor

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(317) 232-8603
(800) 451-6027
www.IN.gov/idem

June 30, 2003

TO: Interested Parties / Applicant

**RE: Ranch Fiberglas, Inc. 039-17661-00110**

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

# Notice of Decision - Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures

June 30, 2003

Mr. Walter M. Stankovich
Ranch Fiberglas, Inc.
28564 Holiday Place
Elkhart, Indiana 46517

Re: 039-17661-00110
First Administrative Amendment to
Part 70 Permit 039-10481-00110

Dear Mr. Stankovich:

Ranch Fiberglas, Inc. was issued a permit on August 9, 2000 for a stationary fiberglass component manufacturing plant. A letter requesting a change was received on April 24, 2003. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows:

Ranch Fiberglas, Inc. submitted a request to:

(a) correct a typographical error found in Condition A.2(a) and Part (a) of the unit description of Section D.1,
(b) change the stack reference described in Condition A.2(f) and Part (f) of the unit description of Section D.1 from "Stack H1" to "general ventilation GV",
(c) draft copies of the quarterly report forms for points EU-02, EU-04, and EU-01.1 and EU-01.2 which were drafted during the initial review, but left out of the final permit, and
(d) change the rail area and mold shop VOC limit from input VOC to VOC emissions.

Condition A.2(a) and Part (a) of the unit description of Section D.1 reference "pounds pf of gel coat per hour". The "pf" reference is a typographical error that shall be removed.

Changing the stack reference from "Stack H1" to "general ventilation GV" shall be achieved by making the appropriate changes to Condition A.2(f) and Part (f) of the unit description of Section D.1.

Ranch Fiberglas, Inc. has also requested that quarterly report forms for emission points EU-02, EU-04, and EU-01.1 and EU-01.2 be drafted because they were never included in the permit. Upon review of the electronic files for Significant Permit Revision 039-16266-00110, issued on April 17, 2003, it was determined that the report forms do exist and were included as part of the final permit. Thus, no changes to the permit are necessary. However, since Ranch Fiberglas, Inc. never received the listed forms, copies of the requested forms shall be included as part of this amendment.

Ranch Fiberglas, Inc. has requested that the VOC limits associated with the rail area and mold shop be based on VOC emissions instead of input VOC because the rail area and mold shop processes are fiberglass processes which have VOC emissions that are determined utilizing "Unified Emission Factors for Open Molding of Composites".

The rail area and mold shop operations are fiberglass operations. The Office of Air Quality (OAQ) has determined that all limits established for fiberglass operations should be based on emissions because of the variability involved with determining the respective VOC emissions.

Yet, the VOC limit established in Condition D.1.2(d), is based on input VOC which is incorrect. This limit shall be changed from a input VOC limit to a VOC emission limit.

In addition, upon review of the descriptions associated with the rail area and mold shops, it was discovered that the descriptions incorrectly reference a maximum capacity to "paint" 12 and 4 units, respectively. The rail area and mold shop processes are fiberglass processes. Thus, the unit descriptions of Section A and D.1 shall be changed to remove the "painting" references.

The proposed changes are minor administrative changes that will have no impact on the source emissions or capacity, result in any changes to any existing requirements, and will not trigger any new applicable requirements.

Therefore, the proposed changes shall be incorporated into the existing source Part 70 permit via an Administrative Amendment pursuant to 326 IAC 2-7-11(a)(1) and (7) which state any changes that correct typographical errors or revise descriptive information where the revision will not trigger a new applicable requirement or violate a permit term, may be incorporated into the existing Part 70 permit via an Administrative Amendment.

To incorporate the proposed changes into the permit, the following changes shall be made. All additional language is indicated in bold type. All deleted information is struck-out.

**(1) Condition A.2:**

Condition A.2(a) shall be amended as follows to remove "pf", change the stack designation of A.2(f) from "Stack H1" to "general ventilation GV", and remove the reference to painting from the rail area and mold shop descriptions.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) gel coat booth (identified as EU-A), with two (2) air-assisted airless gel coat guns, identified as Gel-01 and Gel-02, respectively, with a maximum throughput capacity of 56.7 pounds ~~pf~~ of gel coat per hour and 0.78 pounds of hardener per hour, using dry filters to control particulate matter emissions, and exhausting to two (2) stacks, identified as A1 and A2. (Constructed pre-1970)

.....

(f) One (1) glue application area (identified at EU-04), having a maximum throughput capacity of 37.07 pounds of adhesive per hour, applied using two (2) spray guns, with emissions exhausted ~~at stack H1~~ **through general ventilation, identified as GV**.

(g) One (1) rail area, **equipped** with two (2) HVLP spray guns and one (1) flow coating spray system, with a maximum **design** capacity ~~to paint~~ **of** twelve (12) units per hour, using dry filters for overspray control and exhausting to one stack, identified as D1. (Constructed in 1998)

(h) One (1) mold shop, **equipped** with five (5) air atomization spray guns, with a maximum **design** capacity ~~to paint~~ **of** four (4) units per month, exhausting to one (1) stack, identified as E1. (Constructed in 1998)

.....

**(2) Unit Description of Section D.1:**

The unit description of Section D.1(a) shall be amended as follows to remove “pf”, change the stack designation of D.1(f) from “Stack H1" to “general ventilation GV”, and remove the reference to painting from the rail area and mold shop.

**SECTION D.1 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]**

(a) One (1) gel coat booth (identified as EU-A), with two (2) air-assisted airless gel coat guns, identified as Gel-01 and Gel-02, respectively, with a maximum throughput capacity of 56.7 pounds ~~pf~~ of gel coat per hour and 0.78 pounds of hardener per hour, using dry filters to control particulate matter emissions, and exhausting to two (2) stacks, identified as A1 and A2. (Constructed pre-1970) .....

(f) One (1) glue application area (identified at EU-04), having a maximum throughput capacity of 37.07 pounds of adhesive per hour, applied using two (2) spray guns, with emissions exhausted ~~at stack H1~~ **through general ventilation, identified as GV**.

(g) One (1) rail area, **equipped** with two (2) HVLP spray guns and one (1) flow coating spray system, with a maximum **design** capacity ~~to paint~~ **of** twelve (12) units per hour, using dry filters for overspray control and exhausting to one stack, identified as D1. (Constructed in 1998)

(h) One (1) mold shop, **equipped** with five (5) air atomization spray guns, with a maximum **design** capacity ~~to paint~~ **of** four (4) units per month, exhausting to one (1) stack, identified as E1. (Constructed in 1998) .....

**(3) Condition D.1.2:**

Part (d) of Condition D.1.2 shall be amended as follows to change the limit from an input limit to an emissions limit.

D.1.2 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

(a) Pursuant to 326 IAC 8-1-6 (New Facilities - General Reduction Requirements), the SLI Spray Paint System (identified as EU-02) and the existing final touch-up booth shall comply with the following requirements: .....

(d) Pursuant to CP No. 039-9503-00110, issued July 10, 1998, the ~~input~~ volatile organic compound (VOC) **emissions** ~~content of coating to~~ **from** the rail area and mold shop shall be **limited to** less than twenty five (25) tons per twelve (12) consecutive month period, rolled on a monthly basis. ~~This usage limit is required to limit the potential to emit of VOCs to less than twenty five (25) tons per twelve (12) consecutive month period.~~ **The VOC emissions from the rail area and mold shop shall be calculated by multiplying the the rail area and mold shop usage by the applicable emission factor provided by the most recent version of the “Unified Emissions Factors for Open Molding of Composites”, Composites Fabricators Association.** Compliance with this limit makes 326 IAC 8-1-6, not applicable.

**(4) Rail Area and Mold Shop Quarterly Report Form:**

The rail area and mold shop quarterly report form shall be amended as follows to change the parameter from input VOC to VOC emissions.

Parameter: ~~Input~~ VOC **Emissions**

**(5) Quarterly Report Forms:**

Copies of reporting forms for points EU-02, EU-04, and EU-01.1 and EU01.2 will be included as part of this amendment.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Fulton, at (800) 451-6027, press 0 and ask for Scott Fulton or extension (3-5691), or dial (317) 233-5691.

Sincerely,

Original Signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
SDF
cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Paul Karkiewicz/Tony Pelath
Compliance Data Section - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michele Boner

# PART 70 OPERATING PERMIT
# OFFICE OF AIR QUALITY

## Ranch Fiberglas, Inc.
## 28564 Holiday Place
## Elkhart, Indiana 46517

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

| | |
|---|---|
| Operation Permit No.: T039-10481-00110 | Date Issued: August 9, 2000 |

| | |
|---|---|
| First Significant Permit Revision No.: 039-16266-00110 | Date issued: April 17, 2003 |

| | |
|---|---|
| First Administrative Amendment No.: 039-17661-00110 | Affected Pages: 5, 6, 7, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 43, 44, 45, and 46, with 7a added |
| Issued by: Original Signed by Paul Dubenetzky<br>Paul Dubenetzky, Branch Chief<br>Office of Air Quality | Issuance Date: June 30, 2003 |

## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates stationary fiberglass component manufacturing plant.

| | |
|---|---|
| Responsible Official: | Walter M. Stankovich |
| Source Address: | 28564 Holiday Place, Elkhart, Indiana 46517 |
| Mailing Address: | 28564 Holiday Place, Elkhart, Indiana 46517 |
| SIC Code: | 3089 |
| County Location: | Elkhart |
| County Status: | Attainment for all criteria pollutants |
| Source Status: | Part 70 Permit Program<br>Minor Source, PSD Rules<br>Major Source, Section 112 of the Clean Air Act |

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) gel coat booth (identified as EU-A), with two (2) air-assisted airless gel coat guns, identified as Gel-01 and Gel-02, respectively, with a maximum throughput capacity of 56.7 pounds of gel coat per hour and 0.78 pounds of hardener per hour, using dry filters to control particulate matter emissions, and exhausting to two (2) stacks, identified as A1 and A2. (Constructed pre-1970)

(b) One (1) chop booth (identified as EU-B), with one (1) flow coating spray system, with a maximum throughput capacity of 386.6 pounds of resin per hour and 5.33 pounds of hardener per hour, using dry filters to control particulate matter emissions, and exhausting to two (2) stacks, identified as B1 and B2. (Constructed pre-1970)

(c) One (1) gel coat booth (identified as EU-01.1), constructed in 2003, having a maximum throughput capacity of 56.7 pounds of gelcoat per hour and 0.78 pounds of hardener per hour. The gel coat booth is equipped with one (1) air-assisted airless gel coat gun. Emissions of particulate matter are controlled by dry filters, which exhaust at stacks A3 and A4.

(d) One (1) chop booth (identified as EU-01.2), constructed in 2003, equipped with one (1) flowcoater and having a maximum throughput capacity of 386.6 pounds of resin per hour and 5.33 pounds of hardner per hour. Emissions of particulate matter are controlled by dry filters, which exhaust at stacks B3 and B4.

(e) One (1) SLI spray paint system (identified as EU-02), constructed in 2003, and having a maximum throughput capacity of 16.5 pounds of basecoat per hour and 35.8 pounds of clearcoat per hour. The paint system consists of:

(1) One (1) basecoat booth equipped with two (2) high volume low pressure (HVLP) spray guns, with emissions of particulate matter controlled using dry filters, which exhaust at stack C1.

(2) One (1) flash-off area, with emissions exhausted at stack C2a.

(3) One (1) clearcoat booth, equipped with one (1) high volume low pressure (HVLP) spray gun, with emissions of particulate matter controlled using dry filters, which exhaust at stack C3.

(4) One (1) pre-heater with emissions exhausted at stack C4.

(5) One (1) bake oven with emissions exhausted at stack C5.

(6) One (1) repair paint booth, equipped with one (1) high volume low pressure (HVLP) spray gun, with emissions exhausted at stack C6.

(f) One (1) glue application area (identified at EU-04), having a maximum throughput capacity of 37.07 pounds of adhesive per hour, applied using two (2) spray guns, with emissions exhausted through general ventilation, identified as GV.

(g) One (1) rail area, equipped with two (2) HVLP spray guns and one (1) flow coating spray system, with a maximum design capacity of twelve (12) units per hour, using dry filters for overspray control and exhausting to one stack, identified as D1. (Constructed in 1998)

(h) One (1) mold shop, equipped with five (5) air atomization spray guns, with a maximum design capacity of four (4) units per month, exhausting to one (1) stack, identified as E1. (Constructed in 1998)

(i) One (1) 110 gallon methylene chloride cleaning tank, to be used on a quarterly basis for approximately 60 hours each quarter.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.

(b) The following VOC and HAP storage tank with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons:

Two (2) 200 gallon resin mixing tanks, identified as Mix1 and Mix2.

(c) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(d) The following equipment related to the manufacturing activities not resulting in the emission of HAP's: brazing equipment, cutting torches, soldering equipment, welding equipment:

(1) Three (3) tig welders

(2) Three (3) stick welders

(3) Three (3) mig welders

(e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(f) Paved and unpaved roads and parking lots with public access.

(g) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C.

(h) Machining where an aqueous cutting coolant continuously floods the machining interface.

(i) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

(j) Solvent recycling systems with batch capacity less than or equal to 100 gallons.

(k) Any operation using aqueous solutions containing less than 1% by weight of VOC'S excluding HAP's.

(l) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

(m) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(n) Blowdown for any of the following: sight glass; compressors; pumps; and cooling tower.

(o) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatice conveying; and woodworking operations.

(1) One (1) fiberglass grinding booth, with a maximum capacity of 150 units per day, with one (1) closed loop baghouse dust collector for particulate matter control, exhausting to one (1) dust collector, identified as DC-1.

(p) Other activities or categories not previously identified:

Insignificant Thresholds:
Lead (Pb) = 0.6 ton/year or 3.29 lbs/day Carbon Monoxide (CO) = 25 lbs/day
Sulfur Dioxides (SO2) = 5 lbs/hour or 25 lbs/day Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day
Nitrogen Oxides (NOX) = 5 lbs/hour or 25 lbs/day Volatile Organic compounds (VOC) = 3 lbs/hour or 15 lbs/day

(1) One (1) paint mixing room, exhausting to one (1) stack, identified as F1.

(2) Fifteen (15) paint pumps.

(3) Miscellaneous hand grinders/buffers/cutter tools that are located outside of the grinding booth and throughout the facility.

(4) One (1) 6000 gallon resin holding tank, identified as RT1.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

**SECTION D.1 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]**

a) One (1) gel coat booth (identified as EU-A), with two (2) air-assisted airless gel coat guns, identified as Gel-01 and Gel-02, respectively, with a maximum throughput capacity of 56.7 pounds of gel coat per hour and 0.78 pounds of hardener per hour, using dry filters to control particulate matter emissions, and exhausting to two (2) stacks, identified as A1 and A2. (Constructed pre-1970)

(b) One (1) chop booth (identified as EU-B), with one (1) flow coating spray system, with a maximum throughput capacity of 386.6 pounds of resin per hour and 5.33 pounds of hardener per hour, using dry filters to control particulate matter emissions, and exhausting to two (2) stacks, identified as B1 and B2. (Constructed pre-1970)

(c) One (1) gel coat booth (identified as EU-01.1), constructed in 2003, having a maximum throughput capacity of 56.7 pounds of gelcoat per hour and 0.78 pounds of hardener per hour. The gel coat booth is equipped with one (1) air-assisted airless gel coat gun. Emissions of particulate matter are controlled by dry filters, which exhaust at stacks A3 and A4.

(d) One (1) chop booth (identified as EU-01.2), constructed in 2003, equipped with one (1) flowcoater and having a maximum throughput capacity of 386.6 pounds of resin per hour and 5.33 pounds of hardner per hour. Emissions of particulate matter are controlled by dry filters, which exhaust at stacks B3 and B4.

(e) One (1) SLI spray paint system (identified as EU-02), constructed in 2003, and having a maximum throughput capacity of 16.5 pounds of basecoat per hour and 35.8 pounds of clearcoat per hour. The paint system consists of:

(1) One (1) basecoat booth equipped with two (2) high volume low pressure (HVLP) spray guns, with emissions of particulate matter controlled using dry filters, which exhaust at stack C1.

(2) One (1) flash-off area, with emissions exhausted at stack C2a.

(3) One (1) clearcoat booth, equipped with one (1) high volume low pressure (HVLP) spray gun, with emissions of particulate matter controlled using dry filters, which exhaust at stack C3.

(4) One (1) pre-heater with emissions exhausted at stack C4.

(5) One (1) bake oven with emissions exhausted at stack C5.

(6) One (1) repair paint booth, equipped with one (1) high volume low pressure (HVLP) spray gun, with emissions exhausted at stack C6.

(f) One (1) glue application area (identified at EU-04), having a maximum throughput capacity of 37.07 pounds of adhesive per hour, applied using two (2) spray guns, with emissions exhausted through general ventilation, identified as GV.

**SECTION D.1 FACILITY OPERATION CONDITIONS (Continued)**

**Facility Description [326 IAC 2-7-5(15)]**

(g) One (1) rail area, equipped with two (2) HVLP spray guns and one (1) flow coating spray system, with a maximum design capacity of twelve (12) units per hour, using dry filters for overspray control and exhausting to one stack, identified as D1. (Constructed in 1998)

(h) One (1) mold shop, equipped with five (5) air atomization spray guns, with a maximum design capacity of four (4) units per month, exhausting to one (1) stack, identified as E1. (Constructed in 1998)

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.1.1 PSD Limit [326 IAC 2-2][40 CFR 52.21]

The VOC emissions from the entire source shall be limited as follows:

(a) The VOC emissions from the SLI Spray Paint booth (identified as EU-02) and paint touch-up booth shall not exceed sixty (60) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The VOC emissions from the glue application facility (identified as EU-04) shall not exceed twenty-four (24) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(c) The VOC emissions from the gelcoat and chop booths (identified as EU-01.1 and EU-01.2) shall not exceed twenty-four (24) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(d) The VOC emissions from the gelcoat and chop booths (identified as EU-A and EU-B) shall not exceed one hundred and fourteen (114) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(e) The VOC emissions from the Rail Area and Mold Shop shall not exceed twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

These limits are equivalent to 247 tons of VOC per twelve (12) consecutive month period. Therefore, the provisions of 326 IAC 2-2 and 40 CFR 52.21 not applicable.

D.1.2 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

(a) Pursuant to 326 IAC 8-1-6 (New Facilities - General Reduction Requirements), the SLI Spray Paint System (identified as EU-02) and the existing final touch-up booth shall comply with the following requirements:

(1) The amount of VOC used shall not exceed sixty (60) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(2) Surface coatings applied in the basecoat, clear coat, and paint repair booths shall be applied using high volume low pressure (HVLP) spray guns.

(3) The VOC content of basecoat paints shall not exceed 6.3 pounds of VOC per gallon of coating as applied.

(4) The VOC content of clear coat paints shall not exceed 3.7 pounds of VOC per gallon of coating as applied.

(b) The emissions of volatile organic compounds from the gelcoat and chop booths (identified as EU-01.1 and EU-1.2) shall not exceed twenty-four (24) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. VOC emissions from the gel coats and resins shall be calculated by multiplying the usage of each gel coat and resin by the emission factor provided by the "Unified Emission Factors for Open Molding of Composites", Composites Fabricators Association, April 1999. Compliance with this limit makes 326 IAC 8-1-6 (New Facilities - General Reduction Requirements) not applicable to these gel coat and chop booths.

(c) The amount of VOC used in the glue application facility (identified as EU-04) shall not exceed twenty-four (24) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit makes 326 IAC 8-1-6 (New Facilities - General Reduction Requirements) not applicable to the glue application facility.

(d) Pursuant to CP No. 039-9503-00110, issued July 10, 1998, the volatile organic compound (VOC) emissions from the rail area and mold shop shall be limited to less than twenty five (25) tons per twelve (12) consecutive month period, rolled on a monthly basis. The VOC emissions from the rail area and mold shop shall be calculated by multiplying the the rail area and mold shop usage by the applicable emission factor provided by the most recent version of the "Unified Emissions Factors for Open Molding of Composites", Composites Fabricators Association. Compliance with this limit makes 326 IAC 8-1-6, not applicable.

D.1.3 Cold Cleaner Operation [326 IAC 8-3-2]

The owner or operator of a cold cleaning facility shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operating requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.1.4 Particulate Matter (PM) [40 CFR 52, Subpart P]

Pursuant to 40 CFR 52, Subpart P, the particulate matter (PM) emissions from the gel coat booth, chop booth, paint booth, clear coat booth, rail area, mold shop, and glue application area shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.1.5 Emissions Standards for Reinforced Plastics Composites Fabricating [326 IAC 20-25-3]

Pursuant to 326 IAC 20-25-3, the gelcoat and chop booths shall comply with the following conditions:

(a) The total HAP monomer content of the following materials shall be limited based on the application method used and the products produced as specified in the following table:

| Fiber Reinforced Plastics Composites Products | HAP Monomer Content (Weight %) |
|---|---|
| Resin, Manual or Mechanical Application | |
| Production-Speciality Products | 48* |
| Production-Noncorrosion Resistant Unfilled | 35* |
| Production-Noncorrosion Resistant Filled (greater than or equal to 35% by weight) | 38 |
| Production, Noncorrosion Resistant, Applied to Thermoformed Thermoplastic Sheet | 42 |
| Production, Class I, Flame and Smoke | 60* |
| Shrinkage Controlled | 52 |
| Tooling | 43 |
| Gel Coat Application | |
| Production-Pigmented | 37 |
| Clear Production | 44 |
| Tooling | 45 |
| Production-Pigmented, subject to ANSI[a] Standards | 45 |
| Production-Clear, subject to ANSI[a] standards | 50 |

a - American National Standards Institute.
* - Categories that must use mechanical nonatomized application technology or manual as stated in subsection (c).

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content is sufficient for demonstrating compliance with the HAP monomer content limits.

Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category listed in subsection (b) by the use of resins or gel coats with HAP monomer contents lower than the limits specified, and/or additional emission reduction techniques approved by IDEM, OAQ.

Examples of emission reduction techniques include, but are not limited to, using nonatomized application to apply resins or gel coats within a category that does not require nonatomized application, lower monomer content resins and gel coats, vapor suppression, vacuum bagging, or installing a control device. This is allowed to meet the HAP monomer content limits for resin and gel coats within each category, and shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

For averaging within a category

$$\sum \mathrm{Em}_A \leq \sum \left( M_R * E_a \right)$$

Where:

$M_R$ = Total monthly mass of material within each category (tons).
$E_a$ = Emission factor for each material based on allowable monomer content and allowable application method for each category (lbs of monomer per ton of resin or gel coat applied).
$Em_A$ = Actual monthly emissions from all materials used within a category based on material specific emission factors, emission reduction techniques and emission controls (lbs of monomer).

Note: Fillers may not be used when averaging.

(b) The following categories of materials in subsection (a) shall be applied using mechanical nonatomized application technology or manual application:

(1) Production noncorrosion resistant, unfilled resins from all sources.

(2) Production, speciality product resins from all sources.

(3) Tooling resins used in the manufacture of watercraft.

(4) Production resin used for Class I flame and smoke products.

Nonatomized application equipment means the devices where resin or gel coat material does any of the following:

(1) Flows from the applicator, in a steady state in a observable coherent flow, without droplets, for a minimum distance of three (3) inches from the applicator orifices such as flow coaters, flow choppers, and fluid impingement equipment.

(2) Is mechanically dispensed within or on to a paint roller applicator such as pressure fed rollers.

(3) Is deposited on fiber reinforcement moving through a resin or gel coat bath such as resin impregnators.

Nonatomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, fluid impingement, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

Filled resins are resins containing greater than or equal to thirty-five percent (35%) by weight inert filler material, such as silica micro-spheres or micro-balloons, added to alter the density or other physical properties of the resin. The term "inert filler" does not include pigments.

(c) Unless specified in subsection (b), gel coat application and mechanical application of resins shall be by any of the following spray technologies:

(1) Nonatomized application technology.

(2) Air-assisted airless.

(3) Airless.

(4) High volume, low pressure (HVLP).

(5) Equivalent emission reduction technologies to subdivisions (2) through (4).

(d) The following cleaning operation standards for resin and gel coat application equipment shall apply:

(1) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does no apply to solvents used for removing cured resin or gel coat from application equipment.

(2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.

(3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.

D.1.6 Work Practice Standards for Reinforced Plastics Composites Fabrication [326 IAC 20-25-4]

Pursuant to 326 IAC 20-25-4, the following work practice standards shall be implemented:

(a) Nonatomizing spray equipment shall not be operated at pressures that atomize the material during the application process.

(b) Except for mixing containers as described in (g), HAP containing materials shall be kept in a closed container when not in use.

(c) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.

(d) Solvent collection containers shall be kept closed when not in use.

(e) Clean-up rags with solvent shall be stored in closed containers.

(f) Closed containers shall be used for the storage of the followings:

(1) All production and tooling resins that contain HAPs.

(2) All production and tooling gel coats that contain HAPs.

(3) Waste resins and gel coats that contain HAPs.

(4) Cleaning materials, including waste cleaning materials.

(5) Other materials that contain HAPs.

(g) All resins and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

D.1.7 Operator Training for Reinforced Plastics Composites Fabrication [326 IAC 20-25-8]

Pursuant to 326 IAC 20-25-8, all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:

(a) All new personnel shall be trained within fifteen (15) days of hiring.

(b) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.

(c) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.

(d) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from subdivision (a) if written documentation that the employee's training is current is provided by the new employer.

(e) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.

(f) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:

(1) Appropriate application techniques.

(2) Appropriate equipment cleaning procedures.

(3) Appropriate equipment setup and adjustment to minimize material usage and overspray.

(g) The Permittee shall maintain the following training records on site and available for inspection and review:

(1) A copy of the current training program.

(2) A list al current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

D.1.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the gel coat booth, chop booth, paint booth, clear coat booth, rail area, and mold shop and any control devices.

**Compliance Determination Requirements**

D.1.9 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.10 VOC Emissions

Compliance with Conditions D.1.1 and D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.1.11 Hazardous Air Pollutants (HAP) for Reinforced Plastics Composites Fabrication [326 IAC 20-25]

Pursuant to 326 IAC 20-25, compliance with the HAP monomer content limitations in Condition D.1.2 shall be determined by one of the following:

(a) The manufacturer's certified product data sheet.

(b) The manufacturer's material safety data sheet.

(c) Sampling and analysis, using any of the following test methods, as applicable:

(1) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the total volatile HAP and volatile organic compound (VOC) content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coat to require that the procedure be performed on uncatalyzed resin or gel coat samples.

(2) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatorgraph.

(d) An alternative method that has been approved by IDEM, OAQ.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

D.1.12 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate emissions from the gelcoat booths, chop booths, paint booths, rail area, and mold shop, shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.13 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks, while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the particulate emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.1.14 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) The cleanup solvent usage for each month;

(3) The total VOC usage for each month; and

(4) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.1.12 and D.1.13, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.15 Record Keeping Requirements for Reinforced Plastics Composites Fabrication [326 IAC 20-25]

(a) To document compliance with Condition D.1.5, the Permittee shall maintain records that are complete and sufficient to establish compliance with the HAP monomer content limits. Records maintained shall be taken monthly. Examples of such records include by are not limited to:

(1) The usage by weight and monomer content of each resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and HAP content of each resin or gel coat;

(2) Method of application and other emission reduction techniques for each resin and gel coat used;

(3) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.

(b) To document compliance with Condition D.1.7, the Permittee shall maintain the following records:

(1) A copy of the current training program.

(2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.16 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

D.1.17 Reporting Requirements for Reinforced Plastics Composites Fabrication [326 IAC 20-25]

If monthly emissions averaging pursuant to 326 IAC 20-25-3(h)(2) and Condition D.1.5(a) are used, the Permittee shall submit a quarterly summary report and supporting calculations pursuant to 326 IAC 20-25-7(c).

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR QUALITY
# COMPLIANCE DATA SECTION

## Part 70 Quarterly Report

Source Name: Ranch Fiberglas, Inc.
Source Address: 28564 Holiday Place, Elkhart, Indiana 46517
Mailing Address: 28564 Holiday Place, Elkhart, Indiana 46517
Part 70 Permit No.: T039-10481-00110
Facility: SL1 Spray Paint System (identified as EU-02)
Parameter: Input VOC
Limit: Less than sixty (60) tons per twelve consecutive month period with compliance determined at the end of each month

YEAR: _____

| Month | VOC Usage/Emissons (tons/month) | VOC Usage/Emissions Previous 11 Months (tons) | VOC Usage/Emissions 12 Month Total (tons) |
|---|---|---|---|
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

**9** No deviation occurred in this quarter.

**9** Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR QUALITY
# COMPLIANCE DATA SECTION

## Part 70 Quarterly Report

Source Name: Ranch Fiberglas, Inc.
Source Address: 28564 Holiday Place, Elkhart, Indiana 46517
Mailing Address: 28564 Holiday Place, Elkhart, Indiana 46517
Part 70 Permit No.: T039-10481-00110
Facility: Rail area and Mold shop
Parameter: VOC Emissions
Limit: less than 25 per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

| Month | VOC Emissions (tons/month) | VOC Emissions Previous 11 Months (tons) | VOC Emissions 12 Month Total (tons) |
|---|---|---|---|
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

**9** No deviation occurred in this quarter.

**9** Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR QUALITY
# COMPLIANCE DATA SECTION

## Part 70 Quarterly Report

Source Name: Ranch Fiberglas, Inc.
Source Address: 28564 Holiday Place, Elkhart, Indiana 46517
Mailing Address: 28564 Holiday Place, Elkhart, Indiana 46517
Part 70 Permit No.: T039-10481-00110
Facility: Glue Application Area (identified as EU-04)
Parameter: Input VOC
Limit: Less than twenty four (24) tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

| Month | VOC Usage/Emissions (tons/month) | VOC Usage/Emissions Previous 11 Months (tons) | VOC Usage/Emissions 12 Month Total (tons) |
|---|---|---|---|
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

**9** No deviation occurred in this quarter.

**9** Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR QUALITY
# COMPLIANCE DATA SECTION

## Part 70 Quarterly Report

Source Name: Ranch Fiberglas, Inc.
Source Address: 28564 Holiday Place, Elkhart, Indiana 46517
Mailing Address: 28564 Holiday Place, Elkhart, Indiana 46517
Part 70 Permit No.: T039-10481-00110
Facility: Gel Coat and Chop Booths (identified as EU-01.1 and EU-01.2)
Parameter: VOC Emissions
Limit: Less than twenty four (24) tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

| Month | VOC Emissions (tons/month) | VOC Emissions Previous 11 Months (tons) | VOC Emissions 12 Month Total (tons) |
|---|---|---|---|
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

**9** No deviation occurred in this quarter.

**9** Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____